

Message

From: Koper, Christopher [Koper.Christopher@epa.gov]
Sent: 1/25/2018 5:12:46 PM
To: Eagle, Venus [Eagle.Venus@epa.gov]; Herrick, Jacquelyn [Herrick.Jacquelyn@epa.gov]; Doherty, Michael [Doherty.Michael@epa.gov]
CC: Sankula, Sujatha [Sankula.Sujatha@epa.gov]; Orrick, Greg [Orrick.Greg@epa.gov]; Garber, Kristina [Garber.Kristina@epa.gov]; Mroz, Ryan [Mroz.Ryan@epa.gov]
Subject: Thiamethoxam Poultry Litter (Elanco Slides)
Attachments: Degradation Rates of Clothi in Turkey Bedding.pdf; 044309_DP439290_PRA-Non-Pollinator_11-27-17.pdf

Hi Venus (cc: Poultry Litter Team)

It has come to our attention that a clothianidin degradation study in turkey bedding was conducted in 2015. Results (attached; page 4, 17) show minimal clothianidin degradation throughout the 9 week testing period.

We are not restricting the submission of additional data but in the interest of registrant resources, we could (would) rely on the clothianidin data and assume no degradation in the poultry litter calculations. This was the assumption followed in the 2017 clothianidin assessment (attached; page 34 and Appendix B).

As echoed in the meeting, the tighter they could write the label, the better as we could dial in our assumptions. Examples of this include linear foot treated per house, maximum flocks per year.

Some general notes for label cleanup. I did not see lb ai product per gallon or lb ai per gallon on the front page. I pulled this information from the slides. I know you recommend a poultry house table (similar to the fly table) so that would be helpful for the poultry house rates. Essential info for this table would be how many ounces would treat 1000 square feet (oz/1000 ft²).

I'm going to stop here before this e-mail turns weird.

Hope this helps!

Chris